

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION

IN RE:
Demetris R. Bailey
Cindy E. Bailey
DEBTORS

CHAPTER 13 CASE NO. 19-11943

MOTION TO REDUCE THE PERCENTAGE TO THE UNSECURED CREDITORS

COME NOW the debtors, by and through counsel, and move the Court for an order to adjust the percentage to the unsecured creditors to the lowest amount possible. In support of said motion, debtors would show unto the Court as follows:

1. The debtors filed for relief pursuant to Chapter 13 of the US Bankruptcy Code on September 5, 2019.
2. The debtors are having difficulty making the plan payments and desire for the percent payable to unsecured creditors be adjusted to the lowest amount possible.

DEBTORS MOVE:

1. For service of process on all appropriate parties and for a hearing convenient to the court.
2. For the percent available to unsecured creditors be adjusted to the lowest amount possible.

Respectfully submitted this 13th day of April, 2022.

TEEL & GAY, P.L.C.

/s/ C. Jerome Teel, Jr.
C. Jerome Teel, Jr. 016310
425 E. Baltimore St.
Jackson, TN 38301
Phone: (731) 424-3315

CERTIFICATE OF SERVICE

I, C. Jerome Teel, Jr., counsel for the debtors, do hereby certify that a copy of the foregoing motion has been served by US Mail, postage pre-paid, or by ecf to the parties listed below on this 13th day of April, 2022.

creditors: All creditors on Matrix

/s/ C. Jerome Teel, Jr.
C. Jerome Teel, Jr. 016310

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